

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	1:20CR362
	:	
v.	:	
	:	
ALYSON BROOKE SAUNDERS	:	FACTUAL BASIS FOR PLEA REDACTED IN ACCORDANCE WITH §3509

NOW COMES the United States of America, by and through Steven R. Grocki, Chief, Child Exploitation and Obscenity Section, and Nadia Prinz, Trial Attorney, and as a factual basis under Rule 11, Fed. R. Crim. P., filed under seal pursuant to 18 U.S.C. § 3509, states the following facts which the Government would have proven at trial:

1. In February of 2019, Investigators with Homeland Security Investigations in Winston Salem and the North Carolina State Bureau of Investigation received information that the defendant, ALYSON BROOKE SAUNDERS, (SAUNDERS) was in an online relationship with one Gavin Collins, a convicted sex offender and UK citizen residing in London. During a sex offender home visit at Collin's residence, London Metropolitan Police learned that Collins was in possession of child pornography and that he was corresponding with SAUNDERS, a day care teacher in North Carolina. Upon receiving this information, HSI agents contacted SAUNDERS and learned

she was employed at a day care facility in Greensboro, North Carolina, within the Middle District of North Carolina.

2. Between on or about February 28 and April 4, 2019, agents conducted multiple interviews of SAUNDERS. According to SAUNDERS admissions, Collins had asked her to produce and send him images [REDACTED]

[REDACTED] SAUNDERS indicated she was aware of Collins' sexual interest in children. SAUNDERS further indicated that on multiple occasions in or about February through March of 2019, she took advantage of opportunities to be alone with various minors, such as when changing their diapers or assisting them in the bathroom. [REDACTED]

[REDACTED]

Saunders further stated she would record photos or videos of this conduct at the daycare using her iPhone. Thereupon she would electronically forward these videos and images to COLLINS via Wickr, an encrypted internet-based chat application. SAUNDERS claimed she would then immediately delete the captured images to avoid future detection from law enforcement. While

capturing these images and recordings on her iPhone, she sometimes displayed hand-written notes that contained messages to third-party subjects with whom Collins communicated on the internet. SAUNDERS was told by Collins to destroy the notes afterwards, which she did. SAUNDERS also disclosed that she and Collins had been on a hidden service on the Tor network called the Annex, which website was for users interested in viewing and sharing child pornography.

3. SAUNDERS identified each respective minor victim by name and image and made related specific admissions as follows. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. SAUNDERS indicated she sent all these

images to Collins. SAUNDERS indicated she created and sent Collins these

images because she was worried he would not speak to her if she did not send them.

4. A forensic examination Collin's hard drives, initially seized by the London Metropolitan Police in the course of their own investigation, revealed that he had received and saved images which SAUNDERS had sent him. SAUNDERS was shown images and video clips possessed by Collins on his hard drives and she admitted to having created and sent about 39 of these images, including images of minors depicted in sexually explicit conduct as well as images of herself engaged in other sexual acts. For instance, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. The images of child pornography produced and distributed by SAUNDERS are of real children engaged in sexually explicit conduct,

[REDACTED]

[REDACTED]

[REDACTED] The depictions were produced and transmitted using the Internet, a means or facility of interstate or foreign commerce, and produced by a cellphone, which had been - or which was produced with materials that

had been - mailed, shipped, or transported across state lines or in foreign commerce by any means.